



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX**

**75 Hawthorne Street
San Francisco, CA 94105**

March 28, 2019

Kai Dunn, Ph.D., P.E.
Senior Water Resources Control Engineer
Colorado River Regional Water Quality Control Board
73-720 Fred Waring Dr. Ste 100
Palm Desert, CA 92260

Re: Tentative Order (R7-2019-0003) for California Department of Corrections and Rehabilitation (CDCR) Centinela State Prison Wastewater Treatment Plant (NPDES Permit No. CA7000001)

Dear Mr. Dunn:

Thank you for the opportunity to review and comment on the tentative order/draft permit (Order No. R7-2019-0003, NPDES Permit No. CA7000001) for the discharge of secondary treated wastewater from the Centinela State Prison Wastewater Treatment Plant to a tributary of the New River, which was public noticed on February 26, 2019. EPA has identified one item of concern, as follows:

In the Fact Sheet, section IV.C (WQBELs) appropriately notes that the NPDES regulations require effluent limits to control “all pollutants which...have the reasonable potential to cause, or contribute to an excursion above any state water quality standard.” Therefore the reasonable potential analysis should have been completed for all parameters with applicable Water Quality Standards and data to conduct the analysis, not only the priority pollutants shown in table F-10. For example, the fact sheet should include the reasonable potential calculations for every parameter included in the limits table on page 5 of the permit for which there is a standard (i.e. not flow), as well as all parameters for which data are shown to be available (entries in fact sheet table F-2). The fact sheet should describe the reasonable potential analysis for all parameters which were considered, even parameters for which the conclusion was that effluent limits are not needed.

We appreciate the opportunity to provide input on the public notice draft Centinela WWTP NPDES permit. We look forward to working with you and your staff to resolve this concern prior to issuance of this permit. Please contact Pascal Mues at (415) 972-3768 if you have any questions regarding our comments.